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Functional Chemicals

May 15, 2002

Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
Attn: Chemical Right-To-Know

Re: Additional Information on Butylated Triphenyl Phosphate
CAS No. 220252-35-2

Akzo Nobel Functional Chemicals LLC is pleased to provide you with the following information regarding the substantial effort undertaken to identify all available health and environmental tests conducted with Butylated Triphenyl Phosphate. Every effort was made to be as inclusive as possible during the data search so as to minimize the need for further testing.

The company's product files were searched for any final reports, raw data, or other technical information pertaining to Butylated Triphenyl Phosphate. Several electronic databases were carefully reviewed by chemical name, synonyms, and by CAS number, to identify reports, technical articles, books, or other publications that discuss this chemical substance. The Toxicology Data Network (TOXNET) databases searches include the Hazardous Substances Data Bank, Toxline, and the Developmental and Reproductive Toxicity Data Base. In addition, the Safety Information Resources Inc. database was searched. PubMed, an electronic database of the National Library of Medicine, was also investigated for publications in which Butylated Triphenyl Phosphate is discussed. Information obtained from these electronic resources was included in the Robust Summaries submitted to the EPA.

Many different aromatic phosphate esters exist and they express very different toxicologic properties. Certain of these aryl phosphates are neurotoxic and adversely affect reproduction while others do not show target organ toxicity. Thus structure-activity relationships cannot be used to accurately predict the toxicologic potential of an aryl phosphate. For this reason, Akzo Nobel Functional Chemicals evaluated the toxicity of Butylated Triphenyl Phosphate. We believe the completed tests and the test results published in the scientific literature fulfill the SIDS endpoints for human health effects and aquatic toxicity.

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Akzo Nobel Functional Chemicals is committed to the guidelines defined in the October 14, 1999 letter, which have been carefully considered in the development of the Test Plan.

We ask that this supplemental information be posted on the Environmental Protection Agency HPV Challenge web site.

Very truly yours,

William F. Gentit
Manager, Regulatory Affairs

cc: Jim Keith – American Chemistry Council
Kelly Triplett – Akzo Nobel Chemicals Inc.